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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNDERWRITERS at LLOYDS a/s/o  
YOUNGLIN B&A CO., LTD.

Plaintiff,

- against -

OCEAN WORLD LINES, INC.

Defendant.

Civil Case Number:

**PETITION FOR REMOVAL**  
**PURSUANT TO 28 USC §§ 1446 and 1337**

1. Defendant/Petitioner Ocean World Lines, Inc. hereby petitions the Court pursuant to 28 USC §§ 1446 and 1337 to remove to this Court the above-captioned civil action now pending in the Supreme Court of the State of New York, County of New York, Index Number 07-108 392 filed on or about June 15, 2007. No trial has yet been had therein. Copies of the Plaintiff's Summons with Notice is attached hereto:

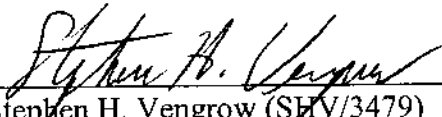
2. Supreme Court for the State of New York, County of New York, Index Number 07-108 392 is one which may be removed pursuant to 28 USC §§ 1446 and 1337 because this Court has original jurisdiction pursuant to U.S.C. § 1337 in that the matter concerns a civil action or proceeding arising under the Act of Congress regulating commerce, including COSCA 46 USC pp 1300-1315, the Harter ACT 46 USC APP §§ 190 to 195.

WHEREFORE, this action now pending in the Supreme Court for the State of New York, County of New York, Index Number 07-108 392, filed on or about June 15, 2007, is properly removed pursuant to 28 USC §§ 1446 and 1337

Dated: July 24, 2007

CICHANOWICZ, CALLAN, KEANE,  
VENGROW & TEXTOR, LLP  
Attorneys for Defendant Ocean World Lines, Inc.

By: \_\_\_\_\_

  
Stephen H. Vengrow (SHV/3479)  
61 Broadway, Suite 3000  
New York, New York, 10006  
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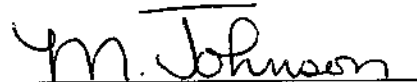
To: Cozen O'Connor  
James F. Campise, Esq.  
Attorney for Plaintiff  
45 Broadway, 16<sup>th</sup> Floor  
New York, New York 10006  
(212) 509-9400

**CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL**

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On July 24, 2007, I served a complete copy of **Defendant Ocean World Lines, Inc.'s**  
**Petition for Removal pursuant to 28 USC §§ 1446 and 1337** to the following attorneys by  
regular U.S. mail at the following address:

TO: Cozen O'Connor  
James F. Campise, Esq.  
Attorneys for Plaintiff  
45 Broadway, 16<sup>th</sup> Floor  
New York, New York 10006  
(212) 509-9400

  
Maria Johnson

DATED: July 24, 2007  
New York, New York